

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

GLOBAL SALES GROUP, CORP.

Plaintiff,

vs.

**SENCI POWER USA, INC. D/B/A A-
IPOWER CORP.**

Defendants.

CASE NO.: **23-cv-01213 (SCC/GLS)**

BREACH OF CONTRACT; VIOLATION
OF THE PUERTO RICO DEALER'S
ACT, Act No. 75 of June 24, 1964, as
amended, 10 P.R. Laws Ann. § 278 *et seq.*;
DEMAND FOR TRIAL BY JURY

**PLAINTIFF'S RENEWED URGENT MOTION FOR MODIFICATION
OF EXPERT DEPOSITION SCHEDULE**

COMES NOW, Global Sales Group, Corp. ("GSG"), through its undersigned counsel, and very respectfully STATES and PRAYS:

On March 19, 2025, GSG filed an *Urgent Motion for Modification of Expert Deposition Schedule* (Docket No. 130) requesting *inter alia* the rescheduling of the deposition of Defendant's damages expert CPA Alberto Fernández to April 4th (from March 28th), or at another date available to CPA Fernandez and the parties. In support of its request, GSG contents that deposition of CPA Fernández should be postponed for, at least, one (1) week because Plaintiff received his expert report only on March 17th, creating an unfair and undue burden on Plaintiff. Given the technical and complex nature of CPA Fernández's report, Plaintiff sustains that it requires additional time to adequately review and prepare for the deposition.

Plaintiff's Renewed Urgent Motion for Modification...

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The Court has not yet ruled on GSG's motion, and the deposition of CPA Morazzani proceeded as scheduled on March 21st. However, the deposition of CPA Fernandez continues to be scheduled for March 28th, so the request to reschedule his deposition is not moot.

Notably, CPA Fernandez was present during the March 21st deposition of CPA Morazzani and expressly confirmed his availability for April 4th, as requested in the pending motion.

WHEREFORE, GSG respectfully requests that the Court take notice of the aforementioned and enter an order modifying the current deposition schedule by moving the deposition of Defendant's expert CPA Alberto Fernández to April 4th (from March 28th), or at another date available to CPA Fernandez and the parties.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico 24th day of March 2025.

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